

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

David J. Catanzaro,

Plaintiff,

v.

Lykart Technologies LLC, et al.,

Defendants.

Civil Action – Law

Case No.: 3:22-CV-01754-JFS-PJC

Judge Joseph F. Saporito

Judge Phillip J. Caraballo

JURY TRIAL DEMANDED

**UNOPPOSED MOTION OF DEFENDANT MICROSOFT CORPORATION
TO EXTEND TIME TO RESPOND**

Defendant Microsoft Corporation (“Microsoft”) moves for an extension of time to respond to Plaintiff’s Fifth Amended Complaint (Dkt. 71), and in support thereof, states as follows:

1. On March 5, 2025, Plaintiff served Microsoft with Plaintiff’s Third Amended Complaint on March 5, 2025. Microsoft’s response to the Third Amended Complaint was set to be due on March 26, 2025.

2. On March 7, 2025, Plaintiff filed a Motion for Leave to File a Fifth Amended Complaint (Dkt. 53).

3. On March 17, 2025, the Court granted Plaintiff’s Motion for Leave to File a Fifth Amended Complaint (Dkt. 67). Microsoft has not yet been served with the Fifth Amended Complaint.

4. Microsoft desires additional time to prepare and file a responsive pleading or motion.

5. Plaintiff concurs in this request for an extension of time of thirty (30) days from Microsoft's previous deadline of March 26, 2025, for Microsoft to answer, or otherwise respond, to the Complaint.

6. Because Plaintiff concurs in this request and the reasons for the request are fully stated in this motion, no supporting brief is required pursuant to M.D. Pa. L.R. 7.5.

7. No party will be prejudiced by this Court granting this extension, and this motion is not being filed for purposes of harassment or delay.

8. This is Microsoft's first request to extend this deadline.

WHEREFORE, Defendant Microsoft Corporation respectfully requests an extension of time to April 25, 2025 for Microsoft to answer, or otherwise respond, to the complaint.

Dated: March 18, 2025

**FAEGRE DRINKER BIDDLE &
REATH LLP**



By: _____

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*Attorney for Defendant Microsoft
Corporation*

CERTIFICATE OF CONCURRENCE

The undersigned certifies that counsel for Defendant Microsoft Corporation contacted Plaintiff regarding Plaintiff's concurrence with the foregoing motion. Plaintiff concurs in the requested relief.

Dated: March 18, 2025

**FAEGRE DRINKER BIDDLE &
REATH LLP**



By: _____
Jessica Natali

*Attorney for Defendant Microsoft
Corporation*

CERTIFICATE OF SERVICE

I certify that on this 18th day of March, 2025, I served a copy of the foregoing **Unopposed Motion of Defendant Microsoft Corporation to Extend Time to Respond** upon all counsel and parties of record via this Court's electronic filing system, which service satisfies the requirements of the Federal Rules of Civil Procedure.

Dated: March 18, 2025

**FAEGRE DRINKER BIDDLE &
REATH LLP**



By: _____

Jessica Natali

*Attorney for Defendant Microsoft
Corporation*